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Sent: Thursday, December 12, 2013 4:43 PM
To: Tom Wheeler
Subject: Inmate calling services for jails

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Federal Communications Commission
Office of the Secretary

Mr. Wheeler:

I am concerned on the anticipated FCC rulemaking for Interstate Inmate Calling Services (**WC Docket No. 12-375**) scheduled for 2/11/2014

The FCC Order mandates a "one-size-fits-all" approach to regulating inmate calling services for jails. Seemingly the order does not focus on the distinctive challenges inherent in providing calling services for smaller county jails that experience high turnover of inmate populations daily and weekly. Inmate calling systems are built to the unique needs of each jail and provide a variety of important safety and security components. The Order disregards this reality and creates a regulatory environment that jeopardizes services. The actions may force jails to severely limit inmate calling privileges. Our county jail does experience real costs in administering these services and the rates set by the FCC eliminate commissions to jails on inter-state calls and do not include any allowance for cost recovery. Costs recovered by us for inmate telephone services are turned over to the county government as a revenue to offset those costs.

I would respectfully advocate for a STAY ORDER for jails until such time as the FCC and Sheriffs' can determine a proper method for counties to recover costs. Because Sheriff's Office budgets are already set for 2014 by the respective county governments, many Sheriffs will not have the financial resources necessary to continue to administer inmate calling services and perform the vital security functions required to protect the public if this Order goes into effect as scheduled..

Sheriff Kevin A. Mulverhill
Franklin County, New York

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